

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

AETNA INC., AETNA HEALTH, INC.,
AETNA HEALTH MANAGEMENT LLC
and AETNA LIFE INSURANCE
COMPANY,

Plaintiffs,

v.

MEDNAX, INC., PEDIATRIX MEDICAL
GROUP, INC. and MEDNAX SERVICES,
INC.,

Defendants.

CIVIL ACTION

No. 18-2217

DEFENDANTS' MOTION TO DISMISS THE COMPLAINT

Defendants Mednax, Inc., Pediatrix Medical Group, Inc., and Mednax Services, Inc. (collectively, "Defendants") hereby move to dismiss the First, Second, Third, Fourth, and Fifth Causes of Action of Plaintiffs' complaint pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure. The grounds for this motion are set forth in Defendants' brief, which is incorporated by reference here.

Dated: June 29, 2018

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

BY: /s/ Luke Nikas

Luke Nikas*

Michael B. Carlinsky (pro hac vice to be filed)

Jennifer Barrett (pro hac vice to be filed)

51 Madison Avenue, 22nd Floor

New York, New York 10010-1601

Ph: (212) 849-7000

Email: lukenikas@quinnemanuel.com

michaelcarlinsky@quinnemanuel.com

jenniferbarrett@quinnemanuel.com

* Admitted Pro Hac Vice

CONRAD O'BRIEN PC

Howard M. Klein (No. 33632)

Robert N. Feltoon (No. 58197)

Andrew K. Garden (No. 314708)

Centre Square West Tower

1500 Market Street, Suite 3900

Philadelphia, PA 19102-2100

Ph: (215) 864-9600

Fax: (215) 864-9620

Email: hklein@conradobrien.com

rfeltoon@conradobrien.com

agarden@conradobrien.com

*Attorneys for Defendants Mednax, Inc., Pediatrix
Medical Group, Inc., and Mednax Services, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, I caused a true and correct copy of the foregoing Motion to Dismiss and associated brief to be electronically filed pursuant to the Court's electronic court filing system and thereby served on all counsel of record, and that the filing is available for downloading and viewing from the electronic court filing system.

Dated: June 29, 2018

/s/ Luke Nikas